

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS**

**UNITED STATES OF AMERICA     }**

**V                                                     }     CASE NO. 4:19CR212 JMM**

**KESHAWN BOYKINS                         }**

**MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE**

Comes now, the Defendant, by and through his attorney, Brooks Wiggins,  
and for his Motion to Continue, states:

1. Counsel was appointed to represent the Defendant on or about May 15, 2019. This matter is set for Jury Trial on January 15, 2020 at 9:15 a.m.
2. The Defendant was released on Conditions, including Location Monitoring. The Defendant's Pre-Trial Officer is Michael Umphenour.
3. The Defendant is a professional boxer and the Location Monitor technology interferes with his ability to actively engage in his trade.
4. Upon information and belief, Officer Umphenour has no objection to the removal of the Location Monitor as a Modification of the Defendant's Conditions of Pre-Trial Release.

WHEREFORE, the Defendant, through counsel, moves the Court to Modify his Conditions of Pre-Trial Release, and for all other relief in which he is entitled.

Respectfully Submitted,

Brooks Wiggins

---

Brooks Wiggins, #2003080

Attorney at Law

111 South Main Street

Benton, AR 72015

(501) 244-2244

(501) 421-6274 FAX

[brooks@jbwiggins.com](mailto:brooks@jbwiggins.com)